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June 8, 1995

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Re: CC Docket No. 92-297, RM-7872, RM-7722  
IC Docket No. 94-31 ✓  
Ex Parte Presentation

Dear Mr. Caton:

Representatives of Hughes Communications Galaxy, Inc. ("Hughes") met this morning with Commission representatives to discuss matters related to the Commission's pending proceedings in CC Docket No. 92-297 and IT Docket No. 94-31. The Hughes representatives were Edward J. Fitzpatrick of Hughes and the undersigned, counsel for Hughes. The Commission was represented by Lisa B. Smith and Brian Carter of Commissioner Barrett's office. The enclosed materials formed the basis for the discussions.

An original and two copies of this letter are enclosed. Copies of this letter are being provided simultaneously to the Commission representatives identified above.

Respectfully submitted,

John P. Janka

Enclosures

**HUGHES**

**Presentation to the  
Federal Communications Commission**

**28 GHz Solutions**

**Hughes Communications Galaxy, Inc.**

**June 8, 1995**

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COMMUNICATIONS  
DIVISION

## **KA BAND IS THE NEXT AVAILABLE LOCATION FOR NEW SATELLITE SERVICES**

- **Access to the Ka band is essential for the delivery of interactive, wideband satellite services**
  - **other bands are congested**
  - **allows use of small (26 inch) dishes**
  - **provides sufficient bandwidth for tomorrow's spectrum intensive applications**
- **Telecommunications providers around the world are eager to utilize Ka band satellites to deploy broadband service**
  - **allows rapid build out of infrastructure**
  - **satellites provide distance insensitive service**
  - **facilitates development of GII**

## **CURRENT DOMESTIC KA BAND PROCEEDING REQUIRES PROMPT RESOLUTION**

- **Hughes is committed to finding a solution to the current domestic impasse at Ka band**
- **Industry proposed domestic band split has broad support**
  - **LMDS (Texas Instruments)**
  - **Computer industry (Hewlett Packard)**
  - **GSO FSS (Hughes)**
  - **non-GSO FSS (Teledesic)**
  - **Spacecraft manufacturers and launch providers (Boeing and Lockheed Martin)**

## **CURRENT DOMESTIC KA BAND PROCEEDING REQUIRES PROMPT RESOLUTION (cont.)**

- **Industry proposed domestic band split serves multiple interests**
  - **provides sufficient spectrum for all pending domestic applications: LMDS, MSS feeder links, non-GSO FSS and GSO FSS**
  - **facilitates development of broadband two-way LMDS service**
  - **implements conclusions of 28 GHz Neg Reg**
    - **non-GSO MSS and LMDS can share**
    - **GSO FSS and LMDS cannot share**
    - **MSS feeder links who will not share with LMDS can be accommodated on a reverse band basis in other bands**

## **CURRENT DOMESTIC KA BAND PROCEEDING REQUIRES PROMPT RESOLUTION**

- **Commission's proposed band split hinges on GSO FSS and non-GSO MSS feeder link sharing**
- **parties recognize that sharing is technically possible if non-GSO system implement certain operational techniques**
- **non-GSO MSS proponents do not believe these sharing techniques are economically feasible**
- **MSS feeder links who cannot share under these terms should be accommodated on a reverse band basis elsewhere**
- **Domestic licensing solution should not limit use of spectrum internationally**

## **CONCLUSION**

**HUGHES**

- **Commission should promptly commence domestic licensing at Ka band**